

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA CHESS  
FEDERATION, INC., an Illinois not-for-  
profit corporation, RANDALL D. HOUGH,  
an individual,

Plaintiffs,

v.

SUSAN POLGAR, an individual,  
GREGORY ALEXANDER, an individual  
DOES 1-10, inclusive

Defendants.

Case No. 3:08-cv-05126-MHP

**[PROPOSED] ORDER GRANTING  
SUSAN POLGAR'S MOTION TO  
COMPEL PRODUCTION OF  
DOCUMENTS WITHHELD ON AN  
INVALID ASSERTION OF THE  
ATTORNEY-CLIENT PRIVILEGE**

Defendant Susan Polgar's Motion To Compel Production of Documents Withheld On An Invalid Assertion Of The Attorney-Client Privilege came on for hearing before this Court on September 14, 2009. G. Whitney Leigh appeared as attorney for Defendant and Karl S. Kronenberger appeared as attorney for Plaintiff.

After considering the moving papers and opposition papers, arguments of counsel and all other matters presented to the Court, IT IS HEREBY ORDERED that the motion is GRANTED. Plaintiffs are HEREBY ORDERED to produce the following categories of documents, if they have not already done so, to the extent that they are responsive to Defendant Susan Polgar's discovery requests in the instant action:

- (1) All communications between Plaintiffs and Mr. Kronenberger concerning the same subject matter(s) as those communications between Plaintiffs and Mr. Kronenberger which were:
  - a. produced to Ms. Polgar by Plaintiffs in the Texas Action;
  - b. attached to the Sloane Answer in the Texas Action, and/or
  - c. produced by Ms. Polgar to Plaintiffs in the instant action.
- (2) All communications between the Plaintiffs and Kronenberger or other counsel relating to any requests for indemnification considered by the federation in this or the related Texas, New York, or Illinois lawsuits;
- (3) All communications between Plaintiffs and Kronenberger which took place prior to November 4, 2007.

DATED: \_\_\_\_\_

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The Honorable Marilyn Hall Patel  
United States District Court Judge